UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER DISASTER SITE LITIGATION

21 MC 100 (AKH)

IN RE: WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

IN RE COMBINED WORLD TRADE CENTER DISASTER AND LOWER MANHATTAN DISASTER SITE LITIGATION (straddler plaintiffs) 21 MC 103 (AKH)

CERTIFICATION OF JAMES E. TYRRELL, ESQ. IN SUPPORT OF SETTLING DEFENDANTS' MOTION FOR EXTENSION OF TIME

- I, JAMES E. TYRRELL, JR., ESQ. being duly sworn, certify as follows:
- 1. I am a partner with the firm Patton Boggs, LLP, and represent Defendants the City of New York and the Contractors¹ (collectively, the "Settling Defendants") in this matter. I submit this certification in further support of the Settling Defendants' Motion for an Extension of Time.
- 2. Attached hereto as Exhibit A are true and accurate copies of Case Management Order Nos. 10, 7, and 2 in the 21 MC 100, 21 MC 102, and 21 MC 103 Consolidated Master Dockets, respectively.

¹ AMEC Construction Management, Inc., AMEC Earth & Environmental, Inc., Bovis Lend Lease LMB, Inc., Evergreen Recycling of Corona (E.R.O.C.), Plaza Construction Corp., Tully Construction Co., Inc., Turner Construction Company, and Turner/Plaza, A Joint Venture, as well as the entities identified in Exhibit A to the World Trade Center Litigation Settlement Process Agreement, as Amended.

3. Attached hereto as Exhibit B is a true and correct copy of a letter from McDermott Will & Emery to Paul J. Napoli, Esq. and Nicholas Papain, Esq., dated August 25, 2010.

Dated: October 21, 2010

/s/ James E. Tyrrell, Jr.

James E. Tyrrell, Jr. (JT 6837) PATTON BOGGS LLP 1185 Avenue of the Americas New York, New York 10036 (212) 246-5100

-and-

One Riverfront Plaza, 6th Floor Newark, New Jersey 07102 (973) 848-5600 Attorneys for Defendants The City of New York and the Contractors